

# Exhibit G

## Brad Heurung

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**From:** Andrew Grill  
**Sent:** Wednesday, December 23, 2020 10:14 AM  
**To:** Brad Heurung  
**Subject:** Fw: Coleman/Fulton

Andrew J. Grill  
**Rock Fusco & Connelly, LLC**  
321 N. Clark Street, Suite 2200  
Chicago, Illinois 60654  
312.970.3422 (office) | 312.494.1001 (fax)  
708.710.7838 (cell)  
[agrill@rfclaw.com](mailto:agrill@rfclaw.com) | <http://www.rfclaw.com>



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**From:** Lisa Meador <LMeador@jsotoslaw.com>  
**Sent:** Tuesday, December 22, 2020 5:20 PM  
**To:** Andrew Grill <agrill@rfclaw.com>; Amy M. Kunzer <amkunzer@TRIBLER.COM>; Patrick R. Moran <pmoran@rfclaw.com>; Sara J. Schroeder <sschroeder@jsotoslaw.com>  
**Cc:** Bill Oberts <wboberts@TRIBLER.COM>  
**Subject:** RE: Coleman/Fulton

Amy-

We understand the difficult position this is for you given the line the CCSAO has now drawn between representation of the County versus the SAO. While we disagree with the CCSAO's position on this given Judge Valdez' order and the production of CCSAO files pursuant to discovery, we are amenable to finding an amicable resolution rather than fight it out. As a note of concern – we would need the documents in ample time to prepare for the depositions. Has there been any discussion with them about the timeline they need in order to accomplish production? I think that would shed light on whether we would need to file a motion to compel given the Court's deadline tomorrow to do so.

Thanks,

Lisa

Lisa M. Meador  
The Sotos Law Firm, P.C.  
(630) 735-3313

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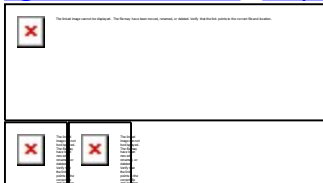
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**From:** Andrew Grill <agrill@rfclaw.com>  
**Sent:** Tuesday, December 22, 2020 5:08 PM  
**To:** Amy M. Kunzer <amkunzer@TRIBLER.COM>; Patrick R. Moran <pmoran@rfclaw.com>; Sara J. Schroeder <SSchroeder@jsotoslaw.com>; Lisa Meador <LMeador@jsotoslaw.com>  
**Cc:** Bill Oberts <wboerts@TRIBLER.COM>  
**Subject:** Re: Coleman/Fulton

Amy,  
I appreciate your willingness to facilitate securing these documents via subpoena. However, to do that, Plaintiffs' counsels' agreement will need to be obtained. Of course, MJ Harjani's order provides ample basis for the subpoena. Are you going to reach out to Nick/Russell this evening to see if they object? Also, tomorrow is the deadline to file any motions needed to secure these materials. In the event Nick/Russell object to your subpoena, we are happy to join in any motion to issue a subpoena. Thanks again.

Sincerely,  
Andrew

Andrew J. Grill  
**Rock Fusco & Connelly, LLC**  
321 N. Clark Street, Suite 2200  
Chicago, Illinois 60654  
312.970.3422 (office) | 312.494.1001 (fax)  
708.710.7838 (cell)  
[agrill@rfclaw.com](mailto:agrill@rfclaw.com) | <http://www.rfclaw.com>



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**From:** Amy M. Kunzer <[amkunzer@TRIBLER.COM](mailto:amkunzer@TRIBLER.COM)>

**Sent:** Tuesday, December 22, 2020 4:29 PM

**To:** Patrick R. Moran <[pmoran@rfclaw.com](mailto:pmoran@rfclaw.com)>; Andrew Grill <[agrill@rfclaw.com](mailto:agrill@rfclaw.com)>; Sara J. Schroeder <[sschroeder@jsotoslaw.com](mailto:sschroeder@jsotoslaw.com)>; Lisa Meador <[lmeador@jsotoslaw.com](mailto:lmeador@jsotoslaw.com)>

**Cc:** Bill Oberts <[woberts@TRIBLER.COM](mailto:woberts@TRIBLER.COM)>

**Subject:** Coleman/Fulton

Counsel:

As you know, ASA David Adelman, while representing former ASA Garfinkel and Cook County, previously produced documents within the CCSAO's possession pursuant to Judge Valdez's order. Judge Valdez took the position that ASA Adelman, an assistant state's attorney, while also acting as counsel on behalf of the County, could secure and produce CCSAO documents on behalf of the CCSAO. Since then, ASA Adelman and the CCSAO withdrew as counsel for the County and Hal Garfinkel based upon a conflict of interest. We were retained based upon that conflict. As conflicts counsel, we do not wear the same hats as ASA Adelman and do not step into his shoes. Clearly, we do not have access to CCSAO documents and do not possess the documents identified on the Amended Privilege Log.

We discussed this issue and your request with the CCSAO in order to facilitate production of documents responsive to Judge Harjani's order. The CCSAO does not challenge Judge Harjani's ruling on the partial waiver issue and is willing to produce responsive documents from the Amended Privilege Log consistent with Judge Harjani's ruling. However, there is no mechanism or legal basis for the CCSAO to simply provide said documents to me as counsel for the County and Garfinkel.

The CCSAO will produce documents consistent with Judge Harjani's ruling pursuant to a subpoena. Accordingly, the County will issue a subpoena this week to the CCSAO requesting that they produce the documents that are responsive to Judge Harjani's December 14, 2020 order relating to the deliberative process privilege waiver. This will require the CCSAO to examine the documents withheld and produce responsive documents. The CCSAO will produce the documents to all parties pursuant to the subpoena issued.

I understand there has been discussions between counsel regarding the ability to issue a subpoena at this time in light of the discovery deadline. I know you are not objecting to such; however, other parties may object. The ultimate goal is to facilitate production of the documents in light of Judge Harjani's order. Any objection to a subpoena would essentially be an objection to the production of said documents. That is not what Judge Harjani intended by issuing his ruling. Again, the CCSAO does not challenge Judge Harjani's order and will produce responsive documents, yet requires a legal basis to do so.

Bill and I are available to discuss this issue at your convenience tomorrow morning. Please advise as to your availability.

**Amy M. Kunzer**  
Attorney at Law

PLEASE NOTE:  
Service per IL Sup. Ct. Rule 11  
is accepted at [docket@tribler.com](mailto:docket@tribler.com)



TRIBLER ORPETT & MEYER P.C.

225 West Washington - Suite 2550  
Chicago, IL 60606-2418

312-201-6400 | 312-201-6448 (d)  
[www.tribler.com](http://www.tribler.com)

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